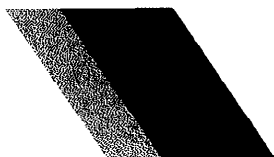


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NJ TRANSIT
The Way To Go.Christine Todd Whitman
GovernorJames Weinstein
Board ChairmanJeffrey A. Warsh
Executive Director

October 25, 2000

Docket Clerk
Docket Management Room
FL-401
400 Seventh Avenue, SW
Washington, DC 20530
FAX: 1-800-647-5527RE: Docket No. NHTSA-98-4511 -28
Platform Lift Systems for Accessible Motor Vehicle Platform Lift Installations

Docket Clerk:

Thank you for providing NJ TRANSIT the opportunity to comment on this important rulemaking.

NJ TRANSIT applauds the National Highway Traffic Safety Administration (NHTSA) for supporting standardization of lift equipment for accessible motor vehicles. NJ TRANSIT's responses to certain questions posed in NHTSA's proposed rulemaking are detailed below.

Question #3 - Since 1997, all 1,108 of the transit buses, cruisers, minibuses and vans acquired by NJ TRANSIT had accessibility lifts installed by the manufacturer.

Question #6 - NJ TRANSIT strongly believes that the effective date for the rules should exempt existing bus orders. Bus orders can carry over multiple years. If these rules were to go into effect on a given date in the middle of a bus order, the manufacturer would need to change the lift equipment. This would result in a lack of uniformity in lift equipment across buses, confusing customers and increasing both manufacturing and maintenance costs.

Question #15 - NJ TRANSIT has no lifts equipped with edge guards that extend beyond the lowest step risers when the lift converts into a step.

Question #23 - NJ TRANSIT has no objection to NHTSA quantifying the amount of resistance required to stop the lift as a safety measure. However, NHTSA should take into account the increased resistance required for normal operation as the lift ages.

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Remember, older parts require more force simply to operate the lift. If this is not taken into account and the amount of resistance is set too low, the normal resistance of aging gears may be enough to trigger the safety stop. This would be a considerable nuisance to operators and the riding public alike.

Question #24 - When setting standards for the manufacturer to test lift equipment, NHTSA should consider that these test standards may also be used by operators even though they are not required. With this in mind, NHTSA should be aware of personnel weight lift restrictions. For example, personnel normally cannot lift more than 50 lbs at a time. Therefore, multiple trips are often required to load a lift with mass greater than 50 lbs.

Question #31 - NJ TRANSIT supports requirements for environmental resistance tests of lifts by the manufacturer.

Question #32 - NJ TRANSIT supports requirements for fatigue endurance tests of lifts by the manufacturer.

Question #33 - NJ TRANSIT supports installation of operations counters on lifts and suggests that those counters be required to be electronic rather than mechanical.

NJ TRANSIT is the nation's largest statewide public transportation system providing bus, rail and light rail services for 366,350 daily commuters on 240 bus routes, two light rail lines and 12 commuter rail lines. It is the third largest transit system in the country with 162 rail stations, 23 light rail stations and more than 17,000 bus stops linking major points in New Jersey, New York and Philadelphia.

Thank you again for providing NJ TRANSIT the opportunity to comment on this important rulemaking.

Sincerely,



Stanley J. Rosenblum
Deputy Executive Director
Chief Operating Officers